EXHIBIT 18

Redacted Version of Document Sought to be Sealed

```
 1            IN THE UNITED STATES DISTRICT COURT

 2         FOR THE NORTHERN DISTRICT OF CALIFORNIA

 3                    OAKLAND DIVISION

 4                       ---o0o---

 5   CHASOM BROWN, et al.,          )

     on behalf of themselves and   )

 6   all others similarly          )

     situated,                     )

 7                                  )

             Plaintiffs,           )Case No.

 8                                 )4:20-cv-03664-YGR-SVK

     vs.                           )

 9                                 )

     GOOGLE LLC,                   )

10                                 )

             Defendant.            )

11   _____)

12

13                       ---o0o---

14            Videotaped Zoom Deposition of

15                   GLENN BERNTSON

16            Tuesday, February 14, 2023

17                    CONFIDENTIAL

18                       ---o0o---

19

20

21

22

23   Katy E. Schmidt

24   RPR, RMR, CRR, CSR 13096

25   Veritext Job No.: 5757744
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 2          FOR THE NORTHERN DISTRICT OF CALIFORNIA

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 5   CHASOM BROWN, et al.,           )

     on behalf of themselves and    )

 6   all others similarly           )

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 7                                   )

             Plaintiffs,            )Case No.

 8                                   )4:20-cv-03664-YGR-SVK

     vs.                            )

 9                                   )

     GOOGLE LLC,                    )

10                                   )

             Defendant.             )

11   _____)

12            BE IT REMEMBERED that, pursuant to Notice,

13   and on Tuesday, the 14th day of February, 2023,

14   commencing at the hour of 6:03 a.m., thereof, in New

15   York, New York, before me, KATY E. SCHMIDT, a

16   Certified Shorthand Reporter in and for the County of

17   Yolo, State of California, there virtually personally

18   appeared

19

                       GLENN BERNTSON

20

21   called as a witness herein, who, being by me first

22   duly sworn, was thereupon examined and interrogated as

23   hereinafter set forth.

24

25
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18   Also present:
19           Steven Togami, Videographer
20           Matthew Gubiotti, In-house counsel
21
                     ---o0o---
22
23
24
25
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1	privacy where they can go interact on the web as a	06:25
2	person that has no prior history, and then when	06:25
3	they're done with that session, it's all thrown out.	06:25
4	So it's privacy by design is how I would	06:25
5	characterize it as a user of Chrome.	06:26
6	BY MR. FRAWLEY:	06:26
7	Q. Is it fair to say that these cookie jars in	06:26
8	your declaration are showing -- let me rephrase this	06:26
9	question.	06:26
10	These cookie jars are not representing	06:26
11	what's happening on the server side of Google.	06:26
12	Is that correct?	06:26
13	MR. ANSORGE: Objection. Form.	06:26
14	THE WITNESS: The notion of a cookie jar is	06:26
15	specifically a client side concept.	06:26
16	BY MR. FRAWLEY:	06:26
17	Q. Can you tell me what "client side" means?	06:26
18	A. In the case of Chrome, the browser within	06:26
19	Chrome.	06:27
20	Q. And how is that different from server side?	06:27
21	A. So when I say within Chrome, let's say you	06:27
22	have a laptop and you have Chrome installed on your	06:27
23	laptop. It is an application that is running in the	06:27
24	memory of your laptop. And all of the content that's	06:27
25	in Chrome is physically stored on your laptop. And as	06:27

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1	you go to sites and, for example, log into sites, that	06:27
2	information is then stored locally inside the	06:27
3	application Chrome which is on your laptop.	06:27
4	And so the notion of a cookie really	06:27
5	represents the equivalent of a document that is stored	06:27
6	inside Chrome. Different cookie jars within Chrome	06:27
7	mean that there are these two different sets of	06:28
8	documents that are not intermingled at all.	06:28
9	Server side is where, say, a request is made	06:28
10	to an entity such as New York Times dot com.	06:28
11	New York Times dot com is a domain that then gets	06:28
12	resolved to a physical device on the internet. And	06:28
13	if, for example, I open up my browser and I type	06:28
14	New York Times dot com, my browser makes a call to	06:28
15	New York Times dot com often with, say, a URL. Could	06:28
16	be just New York Times dot com, could be an actual URL	06:28
17	to a story that when that request is made, the content	06:28
18	that is stored server side, in this case, for example,	06:28
19	the content of a particular page of the	06:28
20	New York Times, is then delivered back to the client.	06:28
21	And so what you're seeing in your client	06:29
22	when you navigate to a given site is a copy of content	06:29
23	that the server, in this case New York Times, had	06:29
24	server side that when you made the request, was	06:29
25	delivered back to your browser and then rendered in	06:29

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1	your browser.	06:29
2	So server side is the information that's	06:29
3	stored basically in the systems associated with, say,	06:29
4	a request from the browser.	06:29
5	Q. And if a user in Chrome incognito visits a	06:29
6	website that uses Google Ad Manager, fair to say that	06:29
7	Google may receive certain data about that visit;	06:29
8	correct?	06:30
9	MR. ANSORGE: Objection. Form.	06:30
10	THE WITNESS: Ad Manager can't tell the	06:30
11	difference between when a user is in private browsing	06:30
12	mode and when they are not.	06:30
13	And if a publisher is using Ad Manager to	06:30
14	serve ads into their site and therefore has integrated	06:30
15	RSDK into their site and enabled that SDK to make an	06:30
16	ad request, then from the user's browser, who has then	06:30
17	loaded the content, say, from the New York Times, an	06:30
18	ad request can be made to Ad Manager to retrieve an ad	06:30
19	that is then rendered in the New York Times. And as	06:30
20	part of that ad request, there's standard HTTP	06:30
21	information that's included in the ad request.	06:30
22	BY MR. FRAWLEY:	
23	Q. And the information that comes to Google in	06:31
24	that scenario would be stored server side in Google	06:31
25	logs; correct?	06:31

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1	If you use IP address, you can't do that.	06:53
2	So we've designed our systems very	06:53
3	specifically to keep IP address to very limited usages	06:53
4	that are sort of required to meet our obligations as	06:53
5	an ad-serving platform, but otherwise it's locked down	06:53
6	and not used by the rest of our systems.	06:54
7	BY MR. FRAWLEY:	
8	Q. Can you look at paragraph 28 of your	06:54
9	declaration?	06:54
10	Do you see where you wrote:	06:54
11	"When the private browsing mode user	06:54
12	closes the session, the cookies that were	06:54
13	set during that private browsing session	06:54
14	are automatically and permanently deleted	06:54
15	from the browser"?	06:54
16	Do you see that?	06:54
17	A. Yes.	06:54
18	Q. And the cookie jar, the cookies are fading	06:54
19	because they're being deleted.	06:54
20	Is that right?	06:54
21	A. Yes. That's -- that's what that indicates.	06:54
22	Q. Now, when the private browsing session is	06:54
23	closed and the cookies are deleted on the browser,	06:54
24	does that mean that the corresponding information is	06:54
25	also deleted by Google on the server side?	06:55

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1	A. Eventually. What happens is because these	06:55
2	cookies are gone, we don't see any more traffic with	06:55
3	these IDs, and a clock starts ticking. Data -- you	06:55
4	know, any data we have associated with an ID, like a	06:55
5	GAIA ID or a Biscotti ID, when it becomes stale, we	06:55
6	will then delete the data after a certain amount of	06:55
7	time.	06:55
8	The longest we're retaining any data like	06:55
9	this would be ████████. So if there's no activity,	06:55
10	we just delete the data. And in many cases copies of	06:55
11	the data that we store, we delete much sooner than	06:55
12	that.	06:55
13	So we won't delete it right away. We use	06:55
14	the fact there's no activity associated with the ID	06:55
15	that we then mark it as stale and then delete the	06:55
16	data.	06:56
17	Q. Okay. Can you look at paragraph -- sorry --	06:56
18	page 13 of your declaration.	06:56
19	So on this page, at least in the top two	06:56
20	paragraphs you're discussing cookie blocking; correct?	06:56
21	A. Yes.	06:56
22	Q. What is cookie blocking?	06:57
23	A. There are two different types of cookie	06:57
24	blocking that are described in the page that you're	06:57
25	referring to.	06:57

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1	websites where you don't even sign into that website?	07:01
2	MR. ANSORGE: Objection. Compound. Form.	07:01
3	THE WITNESS: I didn't say signed in. I	07:01
4	said state. Signed in is one example of state that	07:01
5	can be recorded in a first-party cookie or even a	07:01
6	third-party cookie. It will impact an awful lot more	07:01
7	than just your signed-in browsing experience.	07:01
8	BY MR. FRAWLEY:	
9	Q. Now, in both of these examples on page 13	07:01
10	for cookie blocking, either disabling third-party	07:02
11	cookies or blocking all cookies, do those things	07:02
12	prevent Google Ad Manager from receiving any	07:02
13	information or just some information?	07:02
14	MR. ANSORGE: Objection. Compound. Form.	07:02
15	Vague.	07:02
16	THE WITNESS: When disabling third-party	07:02
17	cookies, that will prevent Ad Manager from receiving	07:02
18	third-party cookies which correspond in our prior	07:02
19	conversations to both GAIA and Biscotti. Those would	07:02
20	both be blocked.	07:02
21	If all cookies are blocked, that would	07:02
22	include GAIA and Biscotti, and that would also include	07:02
23	any first-party identifier that may be set, including	07:02
24	if a publisher is, for example, storing some	07:03
25	representation of a user because they are trying to	07:03

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```
 1    maintain some state.                                07:03

 2           Neither of these options would impact        07:03

 3    whether or not an ad request can be made.  It would 07:03

 4    just impact the information that is stored in cookies 07:03

 5    in the browser from being able to be included in the 07:03

 6    ad request.                                         07:03

 7    BY MR. FRAWLEY:

 8        Q.   So can you look at paragraph 9 of your     07:03

 9    declaration on page 4?                              07:03

10           And do you see where it says                 07:03

11    "Google Ad Manager may receive:" colon, and then    07:03

12    there's a list of information that Google Ad Manager 07:03

13    may receive?                                        07:03

14        A.   Yes.                                        07:03

15        Q.   So in the case of either blocking          07:03

16    third-party cookies or blocking all cookies, those  07:03

17    things are only going to affect No. 1 in this list. 07:04

18           Is that correct?                             07:04

19        A.   I'm reviewing to make sure.                07:04

20        Q.   Please.                                    07:04

21        A.   It does impact 1.  Those that are listed, it 07:04

22    impacts 1.                                          07:04

23        Q.   Okay.  Can you go back to page 13?         07:04

24           Do you see at the bottom where you discuss   07:04

25    disabling JavaScript in Chrome settings?            07:04
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1	Q. Now, going back to how we changed the	08:44
2	examples before and we inserted something underneath	08:44
3	27 where the user goes to gmail and signs in, do you	08:44
4	recall that?	08:44
5	A. I do.	08:44
6	Q. Does that act of signing into gmail change	08:44
7	your view on whether the paragraph 26 cookie is still	08:44
8	part of the data at issue in this case?	08:44
9	MR. ANSORGE: Objection. Vague.	08:44
10	THE WITNESS: My understanding is that the	08:44
11	data at issue for this case is a non-signed-in private	08:44
12	browsing mode.	08:45
13	And as I have documented here in No. 26,	08:45
14	that is a non-signed-in user in private browsing mode,	08:45
15	so it's a pseudonymous non-signed-in Biscotti cookie	08:45
16	that is added to the private browsing mode cookie jar.	08:45
17	In 27, we have another non-signed-in cookie	08:45
18	added to the cookie jar.	08:45
19	You proposed inserting an additional step	08:45
20	which involved signing into a Google property while in	08:45
21	private browsing mode, which itself means we're now	08:45
22	talking about something that is outside the scope of	08:45
23	the case, as I understand it.	08:45
24	BY MR. FRAWLEY:	
25	Q. So I'm just trying to be really specific.	08:45

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1	I'm not trying to reask the same question.	08:45
2	Are you saying that once the user signs in,	08:45
3	in my new No. 28, it is that all future data is	08:45
4	outside the case or does it also make the prior data	08:46
5	in 26 and 27 outside the case?	08:46
6	MR. ANSORGE: Objection. Compound.	08:46
7	Foundation. And calls for a legal conclusion.	08:46
8	THE WITNESS: I'm not sure how to understand	08:46
9	or really answer your question because this	08:46
10	declaration was written with an understanding that the	08:46
11	case is based on non-signed-in users in private	08:46
12	browsing mode.	08:46
13	And if I understand what you're saying,	08:46
14	you're saying, okay, how about signed-in users in	08:46
15	private browsing mode, in which case I may need to	08:46
16	write another declaration.	08:46
17	My understanding is the case -- the scenario	08:46
18	that you brought up is outside the scope of the case.	08:46
19	That is my understanding.	08:46
20	BY MR. FRAWLEY:	
21	Q. So when you think about the case being	08:47
22	limited to signed-out users, you're imagining the user	08:47
23	who stays signed out the entire private browsing	08:47
24	session; correct?	08:47
25	A. The scope of this case is a signed-out	08:47

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1	private browsing session, and I believe you've	08:47
2	answered your own question because if you sign in, it	08:47
3	is no longer a signed-out private browsing session.	08:47
4	So if you sign in during a private browsing	08:47
5	session, it is no longer a signed-out private browsing	08:47
6	session.	08:47
7	Q. And it makes no difference to you whether	08:47
8	the person signs in at the very beginning, in the	08:47
9	middle, or at the end?	08:47
10	MR. ANSORGE: Objection. Compound.	08:47
11	THE WITNESS: I'm happy to talk through how	08:47
12	cookies are managed and data flows even when you sign	08:47
13	into a private browsing session. But that is, as I	08:47
14	understand it, outside the scope of this case. And	08:48
15	this declaration was authored to cover topics that	08:48
16	were in scope for the case.	08:48
17	So I'm happy to answer additional questions	08:48
18	you may have relating to how data is managed and what	08:48
19	data flows look like if you sign in in a private	08:48
20	browsing mode. But the declaration I have written	08:48
21	here is covering material as I understood it to be	08:48
22	within the scope of the case.	08:48
23	BY MR. FRAWLEY:	
24	Q. So one follow-up question on that.	08:48
25	The sentence that I read to you that goes	08:48

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1	It's impossible. Because there are technical	09:14
2	restrictions, there are policies that are very clear,	09:14
3	there are reviews that every piece of code goes	09:14
4	through where multiple people have to look at that	09:14
5	code.	09:14
6	So I say it does because we don't. But if	09:14
7	you actually look at the processes and policies we	09:14
8	have in place, operationally this is impossible	09:14
9	because we've committed to not do it and we put	09:14
10	processes in place that mean it would be impossible to	09:14
11	actually have a product doing this.	09:14
12	The only thing that I can concede is that if	09:14
13	a person who was an engineer, who was in a trusted	09:14
14	role, who was given access to this data for a very	09:14
15	specific business purpose, decided they wanted to find	09:14
16	an IP address and do something nefarious with it, it	09:15
17	is hypothetically possible. But if they did so, they	09:15
18	would be fired.	09:15
19	So, no, I'm not going to concede Google	09:15
20	could do this. We have made it impossible for	09:15
21	ourselves to be able to do this because user privacy	09:15
22	matters.	09:15
23	Q. Does Google Ad Manager use any data that it	09:15
24	receives to train any AI or machine-learning	09:16
25	algorithms?	09:16

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1	A. Yes.	09:16
2	Q. Can you elaborate on that?	09:16
3	MR. ANSORGE: Objection. Form.	09:16
4	THE WITNESS: It's a pretty long list. How	09:16
5	about some examples?	09:16
6	MR. FRAWLEY: That would be helpful.	09:16
7	THE WITNESS: Okay. Machine learning and AI	09:16
8	are tools that allow you to look at sort of a complex	09:16
9	set of data and try to identify patterns so that you	09:16
10	can make predictions about what something may happen.	09:16
11	You can think of them in some ways as being	09:16
12	extensions of statistics.	09:16
13	And in a lot of cases we're using what are	09:16
14	really tools derived from the field of statistics,	09:16
15	like basing an inference, that are really applied in	09:16
16	an at-scale computational manner, which is really what	09:16
17	AI and machine learning is all about.	09:17
18	One case where we use information that, say,	09:17
19	comes in on ad requests and bids that come into our	09:17
20	system is to look at patterns of bids. Like how much	09:17
21	is all the different advertisers that we can integrate	09:17
22	with and provide ads to a publisher? We'll look at	09:17
23	all the bids that come in and look at the distribution	09:17
24	of those bids. And then using machine-learning derive	09:17
25	estimates for what an ideal floor price for a	09:17

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1	publisher would be.	09:17
2	Now, this is really quite powerful for	09:17
3	publishers because publishers can set a floor price	09:17
4	that basically says, "I'm not going to accept an ad	09:17
5	from you unless you pay at least this much money."	09:17
6	And when we send out bid requests, we can	09:18
7	tell advertisers, "Hey, this publisher has set a	09:18
8	floor. You really need to pay more than this if you	09:18
9	actually want to serve the ad."	09:18
10	And what's interesting is when a publisher	09:18
11	communicates, "Oh, here's my floor," if they set that	09:18
12	floor just a little bit above what they know most of	09:18
13	the distribution of bids are, they can change the	09:18
14	behavior of buyers and they bid more.	09:18
15	And so how does a publisher intelligently	09:18
16	set a floor at just the right amount where we know	09:18
17	there's additional demand that's possible to drive	09:18
18	bids up a little bit?	09:18
19	So that's an example of where we're	09:18
20	processing huge amounts of data and we can help	09:18
21	publishers understand even across different parts of	09:18
22	their inventory, such as on the New York Times, on the	09:18
23	sports pages, versus the front page, versus their	09:18
24	cuisine and cooking pages.	09:18
25	What's the ideal strategy for setting floors	09:19

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1	to maximize how much money they are?	09:19
2	So that's an example of how we just use tons	09:19
3	of data to try to find these patterns and solve for	09:19
4	this model that then allows publishers to earn the	09:19
5	maximum amount of money possible for their inventory.	09:19
6	And that's the kind of thing we do. We've	09:19
7	got a lot of data flowing through our system.	09:19
8	For Ad Manager the models we build are	09:19
9	fundamentally how can we help publishers?	09:19
10	MR. ANSORGE: Could I get another time	09:19
11	count, please?	09:19
12	MR. FRAWLEY: Just to be clear, Joey, it's	09:19
13	not limited to three hours. We're on the same page	09:19
14	there; right?	09:19
15	MR. ANSORGE: Yeah. But my understanding	09:19
16	was you were doing another hour. And since we've been	09:19
17	communicating, you were taking a short break, there's	09:19
18	two hearings today, Dr. Berntson has a full deck this	09:19
19	afternoon.	09:19
20	How much longer are you intending on going,	09:19
21	Alex?	09:19
22	MR. FRAWLEY: Not -- I don't think a ton	09:19
23	longer but I just -- this is the second time you asked	09:19
24	so it just seems like you're -- you were asking as if	09:19
25	there's a time hard stop, and I just want to be clear	09:20

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 1   there's not.                                        09:20

 2            THE WITNESS:  I do have a meeting at 1:00   09:20

 3   that if I need to change, I need to notify the person  09:20

 4   that I'm not going to be able to make that meeting.  09:20

 5            MR. FRAWLEY:  I don't think you'll need to  09:20

 6   change that meeting, but I -- I don't -- I don't think  09:20

 7   you will need to.                                   09:20

 8            Should we go off the record to talk about  09:20

 9   this or --                                          09:20

10            MR. ANSORGE:  No.  Let's get the questioning  09:20

11   done.  If you think we can get it done in the       09:20

12   40 minutes, let's do it.                            09:20

13            Except, Dr. Berntson, if you would like a  09:20

14   bathroom break --                                   09:20

15            THE WITNESS:  Let's go.  Let's go.         09:20

16            MR. ANSORGE:  Yeah.  Let's go.             09:20

17   BY MR. FRAWLEY:                                     09:20

18       Q.   All right.  These things that Ad Manager   09:20

19   builds for publishers, do these Google              09:20

20   machine-learning things have names or are there     09:20

21   specific examples of them that have different names?  09:20

22       A.   The example that I gave you is that, it's  09:20

23   optimize floors.  Optimize floors, which evolved to  09:20

24   optimize pricing rules, because pricing rules is where  09:20

25   a publisher can set up different rules for pricing or  09:21
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 1    setting floors on their inventory based on attributes    09:21

 2    of the inventory.                                         09:21

 3             So that would be an example.                     09:21

 4        Q.   And do you remember we agreed earlier that       09:21

 5    Ad Manager doesn't distinguish how it treats private      09:21

 6    browsing traffic from any other kind of traffic?          09:21

 7        A.   Yes.                                              09:21

 8        Q.   Does that apply to Ad Managers' use of data      09:21

 9    to build things like optimize floor?                      09:21

10        A.   Entirely.                                        09:21

11        Q.   Aside from optimize floors -- or floor -- I      09:21

12    forget what you said -- are there any other specific      09:21

13    machine-learning products that Ad Manager has built to    09:21

14    help publishers?                                          09:21

15             MR. ANSORGE:  Mr. Frawley, I'm going to          09:21

16    object as outside of the scope of the declaration.        09:21

17             THE WITNESS:  Yes.                               09:22

18    BY MR. FRAWLEY:                                           09:22

19        Q.   Can you tell me any other specific examples?     09:22

20             MR. ANSORGE:  Objection.  Scope.                 09:22

21             THE WITNESS:  I provided an example.  I          09:22

22    can't give you an exhaustive list.  I don't know if       09:22

23    you're asking for one more example or if you're asking    09:22

24    for every example I can remember.                         09:22

25    ///
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1	BY MR. FRAWLEY:	09:22
2	Q. As many examples as you can remember just	09:22
3	sitting here right now.	09:22
4	MR. ANSORGE: Objection. Scope.	09:22
5	THE WITNESS: Well, this is certainly not	09:22
6	covered in my declaration but let me see what I can	09:22
7	come up with.	09:22
8	So we've talked about optimize pricing	09:22
9	rules, reserved price optimization. Let's see.	09:22
10	Enhanced dynamic allocation. Oh, smart throttling.	09:23
11	BY MR. FRAWLEY:	
12	Q. That's helpful.	09:23
13	If you have --	09:23
14	A. There are more, but...	09:23
15	Q. No. I think in the interest of time we can	09:23
16	stop there.	09:23
17	Fair to say if you had a long time to think	09:23
18	about it, you could come up with an exhaustive list of	09:23
19	close to exhaustive list?	09:23
20	MR. ANSORGE: Objection. Form. Vague.	09:23
21	THE WITNESS: For Ad Manager itself?	09:23
22	BY MR. FRAWLEY:	09:23
23	Q. Yes. For Ad Manager. Okay.	09:23
24	A. But there are other ad products that have	09:24
25	their own models. Yeah.	09:24

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1	Q. And focusing on optimize floors, about how	09:24
2	long has it taken to build that program or model or	09:24
3	whatever you phrase it as?	09:24
4	MR. ANSORGE: Objection. Scope.	09:24
5	Mr. Frawley, do you have any more questions	09:24
6	about Dr. Berntson's declaration? Because although we	09:24
7	might not have had a hard stop of three hours, we did	09:24
8	have an understanding that the questions would be tied	09:24
9	to his declaration, and we have now exceeded the three	09:24
10	hours and you appear to be very far afield from where	09:24
11	we started.	09:24
12	MR. FRAWLEY: So I'll just ask, are you	09:24
13	instructing Dr. Berntson not to answer?	09:24
14	MR. ANSORGE: No. I was asking you whether	09:24
15	you had any questions that pertained to his	09:24
16	declaration with the agreement between the parties	09:24
17	that the questioning would be focused on the	09:24
18	declaration.	09:24
19	MR. FRAWLEY: I think it does, but I don't	09:24
20	think we want to waste time having like an oral	09:24
21	argument because that will take us longer.	09:24
22	MR. ANSORGE: Well, but it would be helpful	09:24
23	if you point to the path in the declaration you're	09:25
24	asking about because I've lost track of where we are.	09:25
25	MR. FRAWLEY: So I'll just re-ask my	09:25

1	question then, and it's your right to instruct	09:25
2	Dr. Berntson not to answer, if that's what you'd like	09:25
3	but -- what did I say?	09:25
4	BY MR. FRAWLEY:	09:25
5	Q. Oh. Focusing on optimize floors, about how	09:25
6	long has it taken to build that program or model?	09:25
7	MR. ANSORGE: Same objection.	09:25
8	THE WITNESS: That was about a year.	09:25
9	BY MR. FRAWLEY:	09:25
10	Q. Okay. I'm going to return to something we	09:25
11	were talking about earlier in the deposition. Forgive	09:25
12	me if I butcher exactly how you described things.	09:25
13	But do you recall when we were talking about	09:25
14	how on the server side, signed-in data will be in	09:25
15	different logs from -- well, I'll just say a long	09:26
16	thing and Joey can object, and we can get there	09:26
17	together.	09:26
18	Do you recall when we were talking about how	09:26
19	signed-in logs are different from signed-out logs when	09:26
20	there's identifiers that are going to be kept in	09:26
21	separate logs? Does that at all ring any bell?	09:26
22	Sort of?	09:26
23	MR. ANSORGE: Objection. Vague.	09:26
24	THE WITNESS: I believe I know what you're	09:26
25	referring to. The characterization is inaccurate.	09:26

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REPORTER'S CERTIFICATE

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3   STATE OF CALIFORNIA   )

) ss.

4   COUNTY OF YOLO   )

5   I, KATY E. SCHMIDT, a Certified Shorthand

6   Reporter in and for the State of California, duly

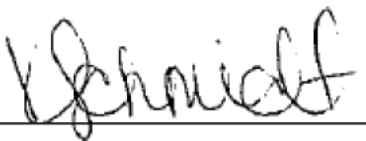7   commissioned and a disinterested person, certify:

8   That the foregoing deposition was taken before

9   me at the time and place herein set forth;

10   That GLENN BERNTSON, the deponent herein, was

11   put on oath by me;

12   That the testimony of the witness and all

13   objections made at the time of the examination were

14   recorded stenographically by me to the best of my

15   ability and thereafter transcribed into typewriting;

16   That the foregoing deposition is a record of

17   the testimony of the examination.

18   IN WITNESS WHEREOF, I subscribe my name on this

19   16th day of February, 2023.

20

21

     _____

22   Katy E. Schmidt, RPR, RMR, CRR, CSR 13096

     Certified Shorthand Reporter

23   in and for the

     County of Sacramento,

24   State of California

25   Ref. No. 5757744 KES

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